

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

In re GROUPON, INC. SECURITIES LITIGATION

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Master File No.: 12 CV 2450

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CLASS ACTION
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This Document Relates To
ALL CASES

: Hon. Charles R. Norgle
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**AGREED MOTION TO SCHEDULE BRIEFING OF LEAD PLAINTIFF'S
AMENDED MOTION FOR CLASS CERTIFICATION**

Lead Plaintiff Michael Carter Cohn ("Lead Plaintiff"), with the agreement of all Defendants, hereby moves this Court for an order entering the attached Stipulation and [Proposed] Order Regarding Scheduling for Briefing of Lead Plaintiff's Amended Motion for Class Certification. *See Exhibit A* hereto (which has also been submitted electronically pursuant to the Court's procedures regarding proposed orders). The parties agree that there is good cause for entry of the attached stipulation, and that it will not prejudice any party.

WHEREFORE, Lead Plaintiff respectfully requests that this Court enter the attached Stipulation and [Proposed] Order Regarding Scheduling for Briefing of Lead Plaintiff's Amended Motion for Class Certification.

Dated: October 2, 2013

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